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November 1, 2021

The deadline to meet and confer and propose next steps in this case is hereby EXTENDED, *nunc pro tunc*, to November 12, 2021. SO ORDERED.



November 2, 2021

The Honorable Jesse M. Furman  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re:** *In re GM LLC Ignition Switch Litig.*, 14-MD-2543 (JMF)  
*White v. General Motors LLC, et al.*, 21-CV-8241

Dear Judge Furman,

In advance of the November 3 deadline for the parties in the above-captioned matter to submit a joint letter proposing next steps (*see* Docket No. 8624), I write on behalf of New GM to inform the Court that we have not yet heard back from Ms. White regarding next steps. The only contact information New GM has for Ms. White is the mailing address provided on her complaint (21-CV-8241, Docket No. 2). On October 26, we sent a letter to Ms. White at that address requesting that she contact New GM's counsel in order to meet and confer by telephone, and laying out New GM's proposed next steps. New GM received confirmation that the letter was delivered to Ms. White via FedEx on October 27, but has not yet received a response. While New GM is prepared to submit proposed next steps in this matter by November 3 consistent with the proposal it sent to Ms. White, New GM wanted to bring this matter to the attention of the Court in the event that it would like to extend the November 3 deadline to allow additional time for Ms. White to contact New GM and for the parties to meet and confer. If Ms. White contacts New GM regarding next steps in this matter on or before November 3, New GM will promptly update the Court.

Additionally, on October 26, New GM sent both Ms. White and Larry Anderson a letter requesting to inspect the vehicle at issue in both of their cases, which was delivered to Ms. White on October 27 and Mr. Anderson on October 26. To date, New GM has not yet received a response from either. On October 29, the Court ordered that New GM, Mr. Anderson, and Ms. White confer regarding inspection of the vehicle and for New GM to report back by November 12. (Docket No. 8650.) Today, New GM mailed the Court's Order to both Ms. White and Mr. Anderson, and requested in its letter that they contact New GM's counsel to propose times to meet and confer regarding the inspection, and provided specific times that New GM would contact Mr. Anderson by phone on November 8 and 9 and seek to join in Ms. White assuming he has her contact information if we do not hear back from them by then.

Respectfully submitted,

/s/ Wendy L. Bloom

cc: MDL Counsel of Record